

# EXHIBIT A

Volume III  
Pages 1-64

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 03-12551-NG

FRANK SACO, :  
Plaintiff, :  
vs. :  
TUG TUCANA and :  
TUG TUCANA CORPORATION, :  
Defendants. :

CONTINUED DEPOSITION of FRANK SACO, taken on behalf of the Defendants, pursuant to the applicable provisions of the Massachusetts Rules of Civil Procedure, before Barbara M. Montijo, a Registered Professional Reporter and Notary Public within and for the Commonwealth of Massachusetts, at the offices of Clinton & Muyzka, P.C., One Washington Mall, Boston, Massachusetts, on October 30, 2006, commencing at 2:00 p.m.

DUNN & GOUDREAU  
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Boston, MA 02109  
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ORIGINAL

1 prescription was for?

2 A. The only script he gave me was for physical  
3 therapy.

4 Q. And that's when you went to Cape Ann Physical  
5 Therapy?

6 A. Yes.

7 MR. KENNEALLY: Off the record.

8 (OFF THE RECORD)

9 Q. Mr. Saco, just to take you back to the TUG  
10 TUCANA and the incident in April of '03. Did  
11 you ever have any discussions with anyone about  
12 that job on board the tug as being a union job?

13 A. I had heard some talk, but nobody approached me  
14 about it or mentioned anything about it. I know  
15 a couple of guys that also worked off and on on  
16 the tug and they weren't union. I don't know a  
17 whole lot about it, but I was never approached.

18 Q. So, at the time you took the site on board the  
19 tug, you didn't know anything about it being a  
20 union project?

21 A. No.

22 Q. Do you recall speaking with anyone about it  
23 being a union project?

24 A. No. No one brought it to my attention.

1 Q. Since your incident, have you come to learn  
2 that it was a union project?

3 A. I didn't know that it was a union project. I  
4 know that there is a union; that, if you're  
5 going to be -- make a career out of it, long  
6 term, you know, I imagine like the skippers'  
7 union, there's probably different unions,  
8 longshoremen's, I don't know.

9 Q. Are you a member of any maritime union?

10 A. No, I'm not.

11 MR. KENNEALLY: Okay. That's all I  
12 have.

13 MR. KEANE: I don't have anything.

14 (DEPOSITION CLOSED AT 3:45 P.M.)  
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